

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ORLANDO RODRÍGUEZ, et al

Plaintiffs

v.

CROWLEY TOWING & TRANSPORTATION CO.  
AND SEAFARERS INTERNATIONAL UNION

Defendants

CIVIL NO. 98-1548 (CCC)  
Consolidated with  
CIVIL NO. 97-2437 (CCC)

**MOTION**

TO THE HONORABLE COURT:

NOW COMES co-defendant Crowley Towing and Transportation Co. (hereinafter “Crowley”), through the undersigned attorneys, and very respectfully states and prays as follows:

1. On November 19, 2004 a Settlement Conference was held before Hon. Justo Arenas in this case. During the Conference, the Court asked the parties to inform the Court the outcome of their settlement negotiations by November 29, 2004.

2. The parties have continued engaging in settlement conversations. However, they have not concluded these efforts. However, they plan to keep on negotiating a possible settlement in the case.

**WHEREFORE**, it is respectfully requested from this Honorable Court to take that it takes notice of the above stated.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 29<sup>th</sup>. day of November, 2004.

**CERTIFICATE OF SERVICE:** We hereby certify that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which

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will send notification of such filing to the following: Ana R. Biascoechea, Esq., [biascoechea@microjuris.com](mailto:biascoechea@microjuris.com), Ellen Silver, Esq., [esilver@seafarers.org](mailto:esilver@seafarers.org), and Benito Gutiérrez-Díaz, Esq., [lcdobenitogutierrez@libertypr.net](mailto:lcdobenitogutierrez@libertypr.net). We also certify that we have mailed by United States Postal Service the document to the following non CM/EDF participants: J. H. Zidell, Esq., City National Bank Building, 300 71<sup>st</sup> St., Suite 605, Miami Beach, FL 33141 and Luis A. Suárez, Esq., 2108 Ave. Borinquen, San Juan, P.R. 00915.

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**s/RAQUEL M. DULZAIDES**  
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